

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554

SEP - 3 1997

In the Matter of)

Federal-State Joint Board on)
Universal Service)

CC Docket No. 96-45

REPLY OF U S WEST, INC.

U S WEST, Inc. ("U S WEST") urges the Federal Communications Commission ("Commission") to adopt its recommendations on issues for reconsideration filed July 17, 1997.¹ Specifically, U S WEST recommended:

- The Commission should establish a National Fund;
- Contributions should be assessed as explicit end-user surcharges;
- The Commission should adopt the Benchmark Cost Proxy Model ("BCPM") for non-rural carriers, take control of the model, and proceed with refinements and implementation;
- Support should flow to the physical loop -- the price for unbundled loops should be adjusted to reflect the average support received by the loop provider;
- The Commission should clarify the rule regarding toll limitation and modify the rule regarding service deposits for Lifeline customers;

¹ Petition for Reconsideration and Clarification of U S WEST, Inc., filed herein July 17, 1997.

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- The Commission should clarify that 47 C.F.R. Section 54.401(a)(3) requires a carrier to offer either toll blocking or toll control, but not both;
- The Commission should modify the rule in 47 C.F.R. Section 54.401(e) to provide that carriers who offer toll blocking may also require Lifeline customers who violate a no-billed toll agreement to pay a service deposit in order to maintain Lifeline service.

None of the parties filing comments provided compelling arguments to reject any of U S WEST's recommendations. In fact, for several recommendations, including the establishment of a National Fund,² contributions assessed through an explicit end-user surcharge,³ and clarification of toll limitation services,⁴ there was overwhelming support. Below, U S WEST will address a few issues raised in the comments on the Petitions for Reconsideration.

² See, e.g., Comments of Sprint Corporation, filed Aug. 18, 1997 at 1-3; Comments of BellSouth Corporation, et al., filed Aug. 18, 1997 at 1-3; Comments of the New Mexico Attorney General, filed Aug. 14, 1997 at 1-4; Comments of the Colorado Public Utilities Commission, filed Aug. 15, 1997 at 1-3; Petition for Reconsideration of the Wyoming Public Service Commission, filed July 16, 1997 at 1-4; and see the numerous ex parte letters filed with the Commission in this proceeding.

³ See, e.g., AT&T Opposition to Petitions for Reconsideration, filed Aug. 18, 1997 at 14-17; Comments of GTE Service Corporation, filed Aug. 19, 1997 at 3-5; Comments of BellSouth Corporation, et al., filed Aug. 18, 1997 at 7-9; Time Warner Communications Holdings, Inc. Opposition to and Comments on Petitions for Reconsideration and Clarification, filed Aug. 18, 1997 at 12-13.

⁴ See, e.g., Comments of GTE Service Corporation, filed Aug. 19, 1997 at 15-17; United States Telephone Association Petition for Reconsideration and/or Clarification, filed July 17, 1997 at 4-7; Ameritech's Comments on Petitions for Reconsideration and/or Rehearing, filed Aug. 18, 1997 at 2, 4-7; Opposition of Bell Atlantic to Petitions for Reconsideration, filed Aug. 18, 1997 at 11-12.

I. THE COMMISSION SHOULD REJECT BELL ATLANTIC'S ASSERTION THAT A COMBINED INTERSTATE/INTRASTATE HIGH COST FUND WOULD DENY STATES THEIR STATUTORY AUTHORITY TO CREATE THEIR OWN HIGH COST FUNDS

This assertion is false and totally without merit.⁵ The issue is not if the states can or cannot create their own high cost fund, the issue is how large will the state high cost fund have to be. Should the Commission proceed with its present recommendation to only fund 25% of the high cost burden above a benchmark, states would have to fund not only the 75%, above the benchmark, but would also have to fund 100% below the benchmark to correspond to a state determined benchmark if the state commission determines the federal benchmark is too high to maintain affordable rates in its state. With or without the lower state benchmark, the states are burdened with the lion's share of high cost funding. As has been clearly demonstrated, high cost states with low population densities simply cannot bear the burden of this support within their state boundaries. Instead the National Fund should fully fund the entire high cost burden above a Federal benchmark, much like it does today, and states should fund the incremental portion they determine necessary to maintain affordable rates in their state below the benchmark. There is nothing that prohibits a state from establishing a state fund if the Commission establishes a fully-funded Federal fund. Both interstate and intrastate revenues would be assessed to support both the Federal and state fund, but the assessment would not be inconsistent with the 1996 Act and would not

⁵ See Opposition of Bell Atlantic to Petitions for Reconsideration, filed Aug. 18, 1997 at 5-6.

impose a burden on intrastate services or revenues. The assessments would be for different levels of costs, they would not be duplicative.

Bell Atlantic's assertion is completely unsubstantiated and should be rejected.

II. THE COMMISSION SHOULD NOT WAIT TO REASSESS ITS
DECISION ON DEVELOPING A UNIFIED APPROACH TO
HIGH COST MECHANISMS

The Commission should not wait to monitor the state high cost mechanism as it stated in its Decision.⁶ The response from state commissions, policy makers, and providers in high cost areas, provides compelling arguments for the Commission to act now rather than later in establishing a National Fund. Although the high cost model for determining support is not yet complete, preliminary numbers from the models give evidence that the high cost burden in most of the states is too great for the states to bear. The Commission should act now on the evidence in the record

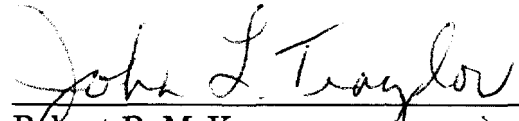
⁶ In the Matter of Federal-State Joint Board on Universal Service, CC Docket No. 96-45, Report and Order, FCC 97-157, rel. May 8, 1997 ¶ 271, appeals pending sub nom. Texas Office of Public Utility Counsel v. FCC, Nos. 97-60421, et al. (5th Cir.).

and should proceed with establishing a national unified approach to the high cost mechanism.

Respectfully submitted,

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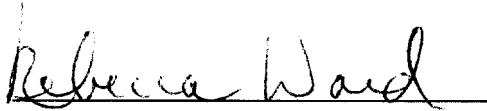
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CERTIFICATE OF SERVICE

I, Rebecca Ward, do hereby certify that on this 3rd day of September, 1997, I have caused a copy of the foregoing **REPLY OF U S WEST, INC.** to be served via first-class United States Mail, postage prepaid, upon the persons listed on the attached service list.


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